

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

ERIK LUNA, individually, and on behalf of all)	
others similarly situated,)	
)	
<i>Plaintiff,</i>)	
)	
v.)	Case No. 18-cv-05165
)	
4C KINZIE INVESTOR LLC, <i>et al.</i>)	
)	
<i>Defendants.</i>)	

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO
ANSWER OR OTHERWISE PLEAD**

Defendants, by their undersigned counsel, pursuant to Federal Rule of Civil Procedure 6(b), respectfully request an extension of time to answer or otherwise plead in response to the Complaint in this case and in support of their motion state the following:

1. Defendants were served with a Collective and Class Action Complaint (“Complaint”) filed in the Circuit Court of Cook County, Illinois, Case No. 2018-CH-9060 on or shortly after July 23, 2018. Doc. 1-1. The Complaint consists of ten counts over more than 100 pages and names over 30 defendants. *Id.* The Complaint alleges a putative class and collective action concerning payroll records going back several years. *Id.*
2. Defendants timely filed notice of removal on July 30, 2018. Doc. 1.
3. Under Federal Rule of Civil Procedure 81(c)(2), Defendants’ responsive pleading is due on August 13, 2018.
4. Defendants require additional time to analyze the complicated, voluminous allegations in this case and determine an appropriate response.
5. Defendants request an additional 21 days, to and including September 4, 2018, to answer or otherwise plead in response to the complaint in this case.

6. Defense counsel discussed the extension with Plaintiff's counsel and Plaintiff's counsel stated he had no objection to the extension.

7. Defendants have not requested any previous extensions in this case.

8. This request is made in good faith and not for purposes of delay.

CONCLUSION

WHEREFORE, Defendants respectfully request an extension of time to and including September 4, 2018 to answer or otherwise plead in response to the Complaint in this case and any other relief the Court deems just and proper.

Date: August 3, 2018

Respectfully submitted,
Defendants, 4C Kinzie Investor LLC, *et al.*,

By: /s/ Daniel W. Tarpey
One of their attorneys

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CERTIFICATE OF SERVICE

I, undersigned attorney, hereby certify that on August 3, 2018, I electronically filed the Defendants' Unopposed Motion for Extension of Time to Answer or Otherwise Plead with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

/s/ Daniel W. Tarpey

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Attorney for Defendants